Exhibit 7

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 1              UNITED STATES DISTRICT COURT

 2             NORTHERN DISTRICT OF CALIFORNIA

 3               SAN FRANCISCO DIVISION

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 5                               )

   ORACLE AMERICA, INC.,         )

 6                               )

          Plaintiff,             )

 7                               )

      vs.                        )Case No.:

 8                               )3:10-cv-03561-WHA

   GOOGLE, INC.,                 )

 9                               )

          Defendant.             )

10   _____)

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14      VIDEOTAPED DEPOSITION OF ROBERT ZEIDMAN

15             San Francisco, California

16            Wednesday, March 16, 2016

17                  Volume 1

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23   Reported by:

     RACHEL FERRIER, CSR No. 6948

24   Job No. 2265300

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1   A   That was the only person that I worked with for
2 any technical work. I know some of the other people
3 there, again, because I've worked with them before, but
4 Mohammed was giving input as to, you know, how to --
5 again, how to optimize the scripts.
6   Q   And who else gave input from Keystone on issues
7 in the case?
8   MR. RAMSEY: Objection; form.
9   THE WITNESS: I don't think anyone else did.
10 BY MR. PAIGE:
11   Q   What are Mohammed's qualifications?
12   A   I don't recall offhand.
13   Q   Do you know what sort of degree he possesses?
14   A   No, I don't.
15   Q   Do you know where he went to school?
16   A   No, I don't.
17   Q   You said you worked with Keystone Strategy
18 before.
19   What other cases have you worked with Keystone
20 Strategy?
21   A   I'm not sure if that's covered by confidentiality
22 or Protective Order, so I'm not sure if I can say.
23   Q   Can you give me a number?
24   A   There were two other cases.
25   Q   And when did those cases take place?

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1   A   One is ongoing, and one was about six months ago.
2   Q   Are you disclosed publicly in either of those
3 cases?
4   A   The one six months ago, I don't believe I was
5 disclosed. The other case, I don't believe I'm publicly
6 disclosed yet.
7   Q   Okay. Did you work with Mohammed on those cases
8 as well?
9   A   No, I didn't.
10   Q   So this is the first time you have worked with
11 Mohammed?
12   A   I believe so, yes.
13   Q   And what input do you recall Mohammed giving into
14 your scripts?
15   A   Well, we both have standardized, for years, in
16 using the Understand program from Scientific Toolworks,
17 so I recall that he suggested using Understand, and we
18 mentioned that we have been using Understand for years,
19 so that didn't affect anything.
20   There were some conversations about which output
21 from Understand would be easiest to parse -- to create a
22 script to parse. Again, I don't recall that we had any
23 differences of opinion there. There were -- I recall
24 some discussions on how to parse the output of
25 Understand to find matches, and I don't recall what the

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1 specifics were at the time, and I don't recall if we
2 adopted any of the suggestions or not. I just remember
3 discussing them.
4   Q   What other input did Mohammed give into your
5 report, if any?
6   A   There's an Exhibit U, where I needed someone to
7 cut and paste the -- oh, let's see, the API descriptions
8 from Android side by -- side by side with the API
9 descriptions from Java, as I recall, and we didn't --
10 Evan and I both were working on a lot of stuff, so we
11 asked Mohammed to do that.
12   Q   And he did so?
13   A   Actually, I believe so, but, again, you know,
14 Evan was in charge of all of that, so I had suggested
15 it, and Evan gave it to me, so I really don't have any
16 firsthand knowledge of whether Evan did that or Mohammed
17 did that.
18   Q   Okay. And Evan might have asked Mohammed to do
19 other things you don't know about; right?
20   A   No. Actually, I've talked to Evan -- that's the
21 only one I don't recall who physically cut and pasted.
22 It wasn't an issue because, really, anybody could have
23 cut and pasted from a web page, but everything else I
24 went through with Evan and confirmed that anything I
25 didn't do, that he did.

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1   Q   So everything in your report, except for
2 Exhibit U, was done by you or Evan?
3   A   Yes.
4   MR. RAMSEY: Objection; form.
5 BY MR. PAIGE:
6   Q   Okay. What other input, if any, did Mohammed
7 give into your report?
8   A   That's all I'm aware of, just the input, just --
9 input on discussions on ways of doing the parsing and
10 the comparing.
11   Q   And it's fair to say that you don't know
12 Mohammed's background or educational experience or
13 anything like that, but you consider him to be good at
14 what he does because he works for Keystone and you think
15 Keystone has a good reputation?
16   MR. RAMSEY: Objection; form.
17   THE WITNESS: Well, I think I have a high opinion
18 of Keystone, having worked with them. I've seen the
19 caliber of the people they hire. But, in any case, we
20 are willing to take input from anyone who seems
21 knowledgeable, but use my judgment and Evan's judgment
22 to decide which is the most efficient way of getting the
23 results that we need, which is what we did.
24 BY MR. PAIGE:
25   Q   And just to be clear, you -- you first worked

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1 Q   Okay. Now --
2 A   -- the levels, yes.
3 Q   -- you downloaded all of the API packages from
4 the Internet; correct?
5 A   All the -- all the API level -- all the API
6 packages in each level, except for Levels 11, 12, and 13
7 of Honeycomb.
8 Q   Did you, personally, download that software?
9 A   No, I didn't.
10 Q   Who did?
11 A   Evan Kovanis.
12 Q   And you didn't use any copies of the Android
13 source code produced by Google in the case for your
14 comparison; right?
15   MR. RAMSEY: Objection; form.
16   THE WITNESS: We couldn't use the Honeycomb
17 source code that was given to us, so the answer is no,
18 we didn't.
19 BY MR. PAIGE:
20 Q   And you didn't use it for Gingerbread either;
21 right?
22 A   I'm not aware. I know that what we used was what
23 we downloaded off the Internet.
24 Q   Not what was produced by Google; right?
25 A   I'm not aware that it was produced by Google, but

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1 if it was, we didn't use it.
2 Q   Okay. And then you used software called
3 Understand to identify an output potential declaring
4 code within both Java and Android code bases; right?
5 A   That was used to -- to start the comparison to
6 analyze the code and to output entities -- what
7 Understand called entities to start the comparison.
8 Q   How many times did you use Understand before this
9 case?
10 A   Maybe 30 or 40.
11 Q   When did you first use Understand?
12 A   Actually, if I look at my CV, I might be able
13 to -- if you want, roughly, the time.
14 Q   Please.
15 A   It's not necessarily -- the first time may not be
16 listed in a case that's in this, but this might give me
17 a rough idea.
18   Yeah, I believe it was in 2005, was the first
19 time I used it.
20 Q   And have you used it previously with Java?
21 A   Yes.
22 Q   About how many times?
23 A   I don't know the exact count, but I would say at
24 least at least three to six times.
25 Q   Okay. Now, you say that you use Understand to

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1 identify and output potential declaring code within the
2 Java and Android code bases.
3   What does that mean, "potential declaring code"?
4 A   Are you referring to a statement I made, or
5 something in my report?
6 Q   Yes, paragraph 32.
7 A   Okay. Let me just look at that.
8 Q   Top of page 8.
9 A   So the -- the reading of that should be: I used
10 Understand to identify out- -- and output potential
11 declaring code within both the Java and Android code
12 bases.
13   In other words, "potential" refers to declaring
14 code within both the Java and Android code bases.
15   The -- Understand can be set up to put out to
16 list what it calls "entities." Most of the entities are
17 what we call declaring code, but it will print out
18 everything, not just the ones that are in common. It
19 will look at the Java code, print out all the entities,
20 and the Android code and print out all the entities, so,
21 potentially, there are matches in there, but then it's
22 the script that I used that actually finds the matches,
23 according to the criteria set forth in the report.
24 Q   So "potential" is potential matches as opposed to
25 potential declaring code?

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1 A   It -- what it means there is potential declaring
2 code within both the Java and Android code, so it's
3 potentially within both, but until we run our script, we
4 don't know if it's in both.
5 Q   So it's not that it's potentially declaring code
6 as opposed to implementing code?
7 A   Correct.
8 Q   Okay. So Understand output just declaring code.
9 It knew what declaring code was?
10 A   Well, we can set it up to output declarations,
11 which are declaring code.
12 Q   Okay. And that's what you did?
13 A   Yes.
14 Q   So you relied entirely upon Understand to
15 determine what was or was not declaring code in that
16 code base?
17 A   Well, we confirmed that what it was putting out
18 was declaring code by manually inspecting it. So -- so
19 there is a possibility, I suppose, that, you know, we
20 undercounted because there is -- you know, perhaps due
21 to some flaw in Understand. It didn't put out all the
22 declaring code, but everything that it the did put out
23 was declaring code.
24 Q   So there's no possibility you overcounted because
25 it put out something that wasn't declaring code.